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*Attorneys for Plaintiff TIFFANY (NJ), LLC.*

THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

TIFFANY (NJ), LLC,	)	Case No.
Plaintiff,	)	
v.	)	<b>PLAINTIFF'S <i>EX PARTE</i> APPLICATION</b>
THE PARTNERSHIPS and	)	<b>FOR ENTRY OF TEMPORARY</b>
UNINCORPORATED ASSOCIATIONS	)	<b>RESTRAINING ORDER AND</b>
IDENTIFIED ON SCHEDULE "A" and	)	<b>PRELIMINARY INJUNCTION</b>
DOES 1-1000,	)	
Defendants.	)	

Plaintiff Tiffany (NJ), LLC ("Plaintiff" or "Tiffany"), will and hereby does apply, on an *ex parte* basis, for entry of a temporary restraining order and, upon expiration of the temporary restraining order, a preliminary injunction against Defendants, The Partnerships and Unincorporated Associations indentified on Schedule "A" hereto and Does 1-1000 (collectively Defendants") pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65.

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1           Good cause exists for the foregoing orders. As set forth in the accompanying Memorandum  
2 of Points and Authorities, the named Defendants and various unknown associates are promoting,  
3 selling, offering for sale and distributing counterfeit and infringing Tiffany branded products within  
4 this Judicial District through various fully interactive commercial Internet websites. The activities of  
5 Defendants constitute willful and intentional infringement and counterfeiting of Tiffany's  
6 trademarks in total disregard of Tiffany's rights, and have taken place in spite of Defendants'  
7 knowledge that their use of Tiffany's trademarks was and is in direct contravention of Tiffany's  
8 rights. Moreover, Defendants' registration of several domain names, which incorporate at least one  
9 of Tiffany's registered trademarks, constitutes cyberpiracy in violation of 15 U.S.C. § 1125(d).  
10 Defendants' unlawful activities have caused and will continue to cause irreparable injury to Tiffany.

11  
12           This Application is brought on an *ex parte* basis pursuant to Federal Rule of Civil Procedure  
13 65 and Civil Local Rule 7-5. Temporary restraining orders are available on an *ex parte* basis when  
14 there is a threat of intervening irreparable harm before the preliminary injunction may be heard. Fed.  
15 R. Civ. P. 65(b); LR-7-5. As set forth in detail in the accompanying Memorandum of Points and  
16 Authorities and Declaration of Stephen M. Gaffigan ("Gaffigan Decl."), Plaintiff is seeking *ex parte*  
17 relief because if it proceeds on notice to Defendants of this *Ex Parte* Application prior to modifying  
18 control of the domain names at issue, Defendants can easily and quickly transfer the registrations for  
19 many of the domain names, or modify registration data and content, change hosts, and redirect traffic  
20 to other websites, thereby thwarting Plaintiff's ability to obtain meaningful relief. (Gaffigan Decl. ¶  
21 4-7.) No stipulation can be obtained with these defendants under these circumstances. This Court  
22 should prevent an injustice from occurring by issuing an *ex parte* temporary restraining order which  
23 precludes Defendants from continuing to display their infringing content via the websites operating  
24 under the domain names at issue and which temporarily removes control over the websites from  
25 Defendants. Only such an order will prevent ongoing irreparable harm to Tiffany.

26           This Application is based upon the accompanying Memorandum of Points and Authorities  
27 and the Declarations of Stephen M. Gaffigan, Steven Costello, and Brandon Tanori, and exhibits  
28

1 thereto, filed concurrently herewith, and the complete files and records of this action, and such other  
2 matters as Tiffany may call to the Court's attention at or before the time of hearing.

3  
4 WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests this Court grant  
5 its *ex parte* application and enter a temporary restraining order, and schedule a hearing on Plaintiff's  
6 Application for Preliminary Injunction before the expiration of the Temporary Restraining Order.

7  
8 Dated: April 18<sup>th</sup>, 2011.

Respectfully submitted,

9  
10 By: /s/ David S. Kahn

David S. Kahn

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16  
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**SCHEDULE A**  
**THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS**

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3	Defendant 1: 925ly.com
	Defendant 2: 925silverangel.com
4	Defendant 3: 925silvershop.com
	Defendant 4: 925tiffany.com
5	Defendant 5: 925tiffany.net
	Defendant 6: 925wholesaler.com
6	Defendant 7: aliexpressuk.com
	Defendant 8: amytrade.com
7	Defendant 9: atjewelry.com
	Defendant 10: atopsilver.com
8	Defendant 11: australiatiffanystore.com
	Defendant 12: autiffany4sale.com
9	Defendant 13: b2bvogue.com
	Defendant 14: bestbuytiffany.com
10	Defendant 15: better-tiffany.com
	Defendant 16: beyeshop.com
11	Defendant 17: brandtiffany.com
	Defendant 18: buy-tiffanyjewelry.com
12	Defendant 19: bybybuy.com
	Defendant 20: canadatiffanystore.com
13	Defendant 21: cartiereshop.com
	Defendant 22: casualtiffany.com
14	Defendant 23: cheapchinawholesale.org
	Defendant 24: cheapdesignerwholesale.com
15	Defendant 25: cheaptiffanyjewelry.com a/k/a tiffanysales.org a/k/a 925silversale.com
	Defendant 26: cheaptiffanys.com
16	Defendant 27: chinafamousproducts.com
	Defendant 28: chinawholesalejewelry.com
17	Defendant 29: cityjewels.net
	Defendant 30: coachjewelry.com
18	Defendant 31: coboen.com
	Defendant 32: colorstrends.com
19	Defendant 33: cooltiffany.com
	Defendant 34: crowntco925.com
20	Defendant 35: designerjewelry.net
	Defendant 36: designertiffanyjewelry.org a/k/a alltiffanyjewelry.com
21	Defendant 37: diorgirl.com a/k/a tiffanyandcostore.com
	Defendant 38: discounttiffany.com
22	Defendant 39: discounttiffanyjewelry.us
	Defendant 40: doreplica.com
23	Defendant 41: eshopping-replica.com
	Defendant 42: etiffanybag.com
24	Defendant 43: europeantiffany.com
	Defendant 44: fakettiffany.org
25	Defendant 45: fakettiffanyjewelry.org a/k/a goldtiffanyjewelry.com
	Defendant 46: fashionjewelryzone.com
26	Defendant 47: fashion-wigs.com a/k/a tiffanybraceletscheap.com
	Defendant 48: forsalettiffany.com
27	Defendant 49: globlefashion.com
28	Defendant 50: goecshop.com

1	Defendant 51:	goldtiffanyjewelry.com
	Defendant 52:	goolcool.com
2	Defendant 53:	greatgolden.com
	Defendant 54:	handbagsforcheap.com
3	Defendant 55:	hot-tiffany.com
	Defendant 56:	hotwholesaleonline.com
4	Defendant 57:	idolbags.com a/k/a rwholesalejewelry.com
	Defendant 58:	ilikejewellery.com
5	Defendant 59:	ilovetiffany.net
	Defendant 60:	istiffany.com
6	Defendant 61:	ixreplicajewelry.com
	Defendant 62:	jewellery888.com
7	Defendant 63:	jewellerybi.com
	Defendant 64:	jewelleryhotsale.com
8	Defendant 65:	jewelleryus.com
	Defendant 66:	jewelry-925.com
9	Defendant 67:	jewelrycheapbuy.com
	Defendant 68:	jewelrykt.com a/k/a tiffanyjewelrynet.com
10	Defendant 69:	jewelryorwatches.com a/k/a alltiffanyjewelry.com
	Defendant 70:	jewelryover.com
11	Defendant 71:	jewelryrain.com
	Defendant 72:	jewelrysale925.com
12	Defendant 73:	jwely.com
	Defendant 74:	kfjewelry.com a/k/a tiffanyjewelrynet.com
13	Defendant 75:	ktop.com
	Defendant 76:	linkworldco.com
14	Defendant 77:	lipwu.com
	Defendant 78:	lovetiffanyjewelry.com
15	Defendant 79:	luckyjewelryshop.com
	Defendant 80:	luxurysandals2u.com
16	Defendant 81:	lzsaler.net
	Defendant 82:	mirrorjewelry.com
17	Defendant 83:	msmrapparel.com a/k/a tiffanyjewelrynet.com
	Defendant 84:	myfaketiffany.com
18	Defendant 85:	mytiffanycity.com
	Defendant 86:	mytiffanyonline.com
19	Defendant 87:	mytiffanysjewelry.com
	Defendant 88:	mytiffanysonline.com
20	Defendant 89:	new925silverjewelry.com
	Defendant 90:	newtiffany.com
21	Defendant 91:	newtiffanys.com a/k/a alltiffanyjewelry.com
	Defendant 92:	ojewellery.com
22	Defendant 93:	onlytobuy.com
	Defendant 94:	onsaletiffany.com
23	Defendant 95:	pocvt.com
	Defendant 96:	popularartiffany.com
24	Defendant 97:	pradashoeschina.com a/k/a pradashoeschina.com
	Defendant 98:	pursestrade.com
25	Defendant 99:	replicagalleryonline.com
	Defendant 100:	replicasilverjewelry.com
26	Defendant 101:	replicasky.com
	Defendant 102:	replicatiffany.net
27	Defendant 103:	saarcaa.com
	Defendant 104:	saletiffanyjewelry.org a/k/a tiffanysalejewelry.com a/k/a 925silversale.com

1	Defendant 105:	sghgate.com
	Defendant 106:	sheloves925silver.com
2	Defendant 107:	shoes51.com
	Defendant 108:	silver-bulk.com
3	Defendant 109:	silverjewelryblog.net a/k/a silvertiffanyshop.com
	Defendant 110:	silverjewelryworld.com
4	Defendant 111:	silverliker.com
	Defendant 112:	silvertiffanyshop.com
5	Defendant 113:	silverurban.com
	Defendant 114:	solid925silver.com
6	Defendant 115:	sterlingtiffany.com
	Defendant 116:	super925.com
7	Defendant 117:	taltoo.com
	Defendant 118:	tc01837.com
8	Defendant 119:	tcogift.com
	Defendant 120:	thesalesky.com
9	Defendant 121:	tiffany4ever.com
	Defendant 122:	tiffany4girls.com
10	Defendant 123:	tiffany4u.us
	Defendant 124:	tiffany7.com
11	Defendant 125:	tiffany.com
	Defendant 126:	tiffanyamerica.com
12	Defendant 127:	tiffanyandcojewelry.com
	Defendant 128:	tiffany-and-co-jewelry.com
13	Defendant 129:	tiffanyandcooutlet.com
	Defendant 130:	tiffanyandco-outlet.com
14	Defendant 131:	tiffanyandcooutlet.org
	Defendant 132:	tiffanyandcosale.com
15	Defendant 133:	tiffanyandcostore.com
	Defendant 134:	tiffanyboss.com
16	Defendant 135:	tiffanybraceletscheap.com
	Defendant 136:	tiffanybuying.com
17	Defendant 137:	tiffanyco1837.com
	Defendant 138:	tiffanyco-mall.com a/k/a tiffanyco-mall.net
18	Defendant 139:	tiffanycouk.com
	Defendant 140:	tiffanycow.com
19	Defendant 141:	tiffanycows.com
	Defendant 142:	tiffany-fashion.com
20	Defendant 143:	tiffanyforsale.com
	Defendant 144:	tiffanyforu.com
21	Defendant 145:	tiffany-guide.com
	Defendant 146:	tiffanyhere.com
22	Defendant 147:	tiffanyhotsale.com
	Defendant 148:	tiffanyinfo.com
23	Defendant 149:	tiffanyinlove.com
	Defendant 150:	tiffanyjewelersuk.com
24	Defendant 151:	tiffany-jewellery-shop.com
	Defendant 152:	tiffanyjewelry.co
25	Defendant 153:	tiffanyjewelry1837.com
	Defendant 154:	tiffanyjewelry2011.com
26	Defendant 155:	tiffanyjewelry2u.com
	Defendant 156:	tiffanyjewelry4sale.com
27	Defendant 157:	tiffanyjewelryauctions.com
	Defendant 158:	tiffanyjewelryforsale.com

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1	Defendant 159:	tiffanyjewelrygift.com
	Defendant 160:	tiffanyjewelrynet.com
2	Defendant 161:	tiffany-jewelry-on-sale.com
	Defendant 162:	tiffanyjewelryonsale.org
3	Defendant 163:	tiffanyjewelryoutlet.com
	Defendant 164:	tiffanyjewelry-outlet.com
4	Defendant 165:	tiffanyjewelrysale.com
	Defendant 166:	tiffanyjewelrysales.com
5	Defendant 167:	tiffanyjewelryshops.com a/k/a tiffanyjewelrynet.com
	Defendant 168:	tiffanyjewelrystores.com
6	Defendant 169:	tiffanyjewelrystyle.com
	Defendant 170:	tiffanyknockoffs.com
7	Defendant 171:	tiffany-mine.com
	Defendant 172:	tiffanynew.com
8	Defendant 173:	tiffanyo.com
	Defendant 174:	tiffanyonlinestoreus.com
9	Defendant 175:	tiffanyonsale.net a/k/a ustiffany4sale.com
	Defendant 176:	tiffanyoutlet.com
10	Defendant 177:	tiffanyoutlet.org
	Defendant 178:	tiffanyoutletcheap.com
11	Defendant 179:	tiffanyoverstock.com
	Defendant 180:	tiffanys1837jewelry.com
12	Defendant 181:	tiffanysalesstore.com
	Defendant 182:	tiffanysave.com
13	Defendant 183:	tiffanyselected.com
	Defendant 184:	tiffany-seller.com
14	Defendant 185:	tiffanysforever.com
	Defendant 186:	tiffanysilversale.com
15	Defendant 187:	tiffanysjewelryonline.com
	Defendant 188:	tiffanysjewelryshop.com
16	Defendant 189:	tiffanysjewelryworld.com
	Defendant 190:	tiffanysky.com
17	Defendant 191:	tiffanysocool.com
	Defendant 192:	tiffanysonly.com
18	Defendant 193:	tiffany-sterling-silvers.com
	Defendant 194:	tiffanystock.com
19	Defendant 195:	tiffanystore.uk.com
	Defendant 196:	tiffanysupplier.com
20	Defendant 197:	tiffanytopsale.com
	Defendant 198:	tiffanyuksale.com
21	Defendant 199:	tiffanyusonsale.com
	Defendant 200:	tiffanywto.com
22	Defendant 201:	toopgood.com
	Defendant 202:	top1tiffany.com
23	Defendant 203:	towholesalejewelry.com
	Defendant 204:	uktiffanyonsale.com
24	Defendant 205:	upoun.com
	Defendant 206:	urbanclothingchina.com
25	Defendant 207:	usdesignerjewelry.com
	Defendant 208:	ustiffany4sale.com
26	Defendant 209:	utiffany.com
	Defendant 210:	vogueonsale.com
27	Defendant 211:	watches-trade.com
	Defendant 212:	wholesale1837.com

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1 Defendant 213: wholesaleabc.net  
2 Defendant 214: wholesaleanywhere.com  
3 Defendant 215: wholesalecm.com  
4 Defendant 216: wholesale-tiffany-jewellery.com  
5 Defendant 217: wholesaletiffanyjewelry.net a/k/a tiffanyonlineus.com  
6 Defendant 218: whslecn.com  
7 Defendant 219: winlo.com  
8 Defendant 220: wowyahoo.com  
9 Defendant 221: x-jewelrybox.com  
10 Defendant 222: yahooowholesaler.com  
11 Defendant 223: yasajewelry.com a/k/a tiffanyjewelrynet.com  
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